THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
Facsimile: (216) 566-2730

October 15, 2010

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Updated Revised Addendum to the May 2009 Supplemental RI Work Plan
Sherwin-Williams/Hilliard's Creek Site – Former Manufacturing Plant,
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035
Incorporation of West Clementon Road Residential Properties

Dear Mr. Klimcsak:

The Sherwin-Williams Company (Sherwin-Williams) has reviewed the October 5, 2010 comments provided by the United States Environmental Protection Agency (EPA) on the August 16, 2010 "*Revised Addendum to the May 2009 Supplemental RI Work Plan, Incorporation of West Clementon Road Residential Properties*" (Revised Work Plan Addendum). Sherwin-Williams accepts the EPA comments and is submitting this Updated Revised Addendum.

Sherwin-Williams had previously reviewed the June 17, 2010 comments provided by the EPA on the April 29, 2010 "*Addendum to the May 2009 Supplemental RI Work Plan, Incorporation of West Clementon Road Residential Properties*" and the August 16, 2010 Revised Work Plan Addendum had been submitted in response to that comment letter.

Scope of Work

This Work Plan Addendum addresses soil sampling at eight residential properties located along West Clementon Road in Gibbsboro, New Jersey ranging in size from approximately 0.17 acre to approximately 0.61 acre:

- 23A W. Clementon Road (0.17 acre)
- 23B W. Clementon Road (0.18 acre)
- 25 W. Clementon Road (0.17 acre)
- 29 W. Clementon Road (0.34 acre)
- 31 W. Clementon Road (0.21 acre)
- 33 W. Clementon Road (0.21 acre)
- 35 W. Clementon Road (0.34 acre)
- 43 W. Clementon Road (0.61 acre)

Based on the comments provided by the EPA, 11 to 30 borings will be installed on or adjacent to each property for the purpose of determining if metals (lead and / or arsenic) or polynuclear aromatic hydrocarbons (PAHs) are present in soil at levels greater than the New Jersey Department of Environmental Protection (NJDEP) Residential Direct Contact Soil Remediation Standards (RDCSRS). During this investigation, additional borings may be installed and additional samples collected based on field observations and results of X-Ray Fluorescence (XRF) analysis. The results of this investigation will be used to develop recommendations for further investigation and/or remedial action.

Property Access

Sherwin-Williams previously contacted the property owners along W. Clementon Road and obtained access from seven of the eight property owners to conduct additional sampling on their properties. However, given that the access authorizations were obtained almost a year ago, Sherwin-Williams will again request access from the property owners as it is unknown if any of the properties have changed ownership. Also, given the scope of the sampling program has now been agreed upon, it is hoped that all the property owners will agree to participate in the additional sampling.

Once access is obtained, Sherwin-Williams will conduct an interview with the property owner to determine their knowledge of any historical soil movement on the property. A copy of the questionnaire to be used is included as Attachment 1.

Sample Locations

Borings will be installed at a total of 144 sampling locations, as shown on Figure 1. Consistent with the June 17, 2010 EPA comments, the locations are based on:

- An initial grid sampling size of 20' x 20' for each property. Several sampling locations have been removed or relocated at the direction of the EPA, resulting in the locations presented on Figure 1. The EPA June 17, 2010 comment letter provides the specifics and rationale for the removal and relocation of sampling locations. A copy of this letter has been included as Attachment 2.

- Sampling locations are offset 10 feet from the drip lines of houses, wood play areas, fence lines, driveways and parking areas to minimize the possible confounding effects of leaded paint, leaded gasoline and arsenic-containing wood preservatives. At the direction of the EPA, however, fenceline sampling will be conducted at two locations adjacent to the back fence of the 35 W. Clementon Road property.

- At the direction of the EPA, off-property sampling will be conducted east of the 29 W. Clementon Road back fenceline, and immediately in back of the eastern fenceline at the 31 W. Clementon Road property.

Previous EPA Sampling Locations

The EPA has requested that Sherwin-Williams return to the former sampling locations where one or more constituents were previously found at a level greater than the RDCSRS and vertically delineate the constituents(s) in soil. However, when the previous EPA sampling locations are located within 5 feet of a new proposed grid location, the EPA location will be substituted for grid location. A total of 7 EPA sample locations will be substituted for a newly proposed grid location, as presented in the table below:

Grid Boring Locations to be Replaced with Former EPA Locations

Grid Boring Location to be Replaced*	Former EPA Location to be Used
23B-SB6	23B-ss-10
25-SB4	25-ss-6
25-SB5	25-ss-5
25-SB7	25-ss-3
35-SB4	35-ss-8
35-SB8	35-ss-9
35-SB9	35-ss-7

*Although the Former EPA Location is to be used for this sampling program, the New Grid Boring Location ID will be used to distinguish this sampling event from the previous EPA sampling program.

Where a previous EPA sample location with an exceedance is greater than 5 feet away from a newly proposed grid boring location, both the previous EPA sample location and the new grid boring location will be sampled. We have identified eight (8) sample locations where this occurs, as presented in the table below. Also shown below is the associated sample designation code to be used during this program, for consistency:

Former EPA Locations to be Re-sampled

Former EPA Location to be Re-sampled	Grid Boring Location Designation*
23B-ss-5	23B-SB15
29-ss-4	29-SB18
29-ss-7	29-SB-19
29-ss-10	29-SB20
33-ss-3	33-SB14
35-ss-1	35-SB26
35-ss-6	35-SB27
43-ss-7	43-SB30

*Although the Former EPA Location is to be used for this sampling program, the New Grid Boring Location ID will be used to distinguish this sampling event from the previous EPA sampling program.

It should also be noted that five of the newly proposed grid sampling locations have been removed from this proposed sampling program based on the fact that a previous EPA sample lies within close proximity (within 5 feet) of the newly proposed sample grid

location, and the previous EPA sample location did not contain any exceedances. EPA has reviewed these sample locations and is in agreement with this approach. One sample from each of the following properties has been removed based on this rationale, 23A, 29, 31, 33, and 43.

Sample Screening, Collection and Analysis

Soil borings will be installed at each location and samples collected from the 0.0' – 0.5' and 1.5' – 2.0' intervals. Samples collected from both intervals will be sent to the laboratory for analysis for TAL Metals plus cyanide, and samples collected from the 1.5' – 2.0' interval will also be analyzed for PAHs.

All sampling and analysis will be conducted pursuant to the approved Quality Assurance Project Plan (QAPP) contained within the "*Supplemental Remedial Investigation Work Plan - Sherwin-Williams / Hilliard Creek Site - Former Manufacturing Plant*" dated May 2009 and revised July 2009. Additional information regarding the analytical method, data validation and other Quality Assurance/Quality Control information (duplicate samples, equipment decontamination, etc.) may be found in the above-referenced QAPP. Please note that the existing CLP Method ILM05.4 (cited in the above-referenced QAPP) has been updated and replaced with CLP Method ISM01.2, which is the most current analytical method for metals, mercury and cyanide analyses.

The samples will be screened with a handheld XRF unit for lead and arsenic and with a handheld Photoionization detector (PID) for volatile organic compounds (VOCs). Based on the XRF and PID results, the following field decisions will be made:

- The boring will terminate at the 1.5' – 2.0' interval if there is no evidence of impacted soils based on field observations (odor, staining, etc.), PID readings, and XRF screening results indicate that arsenic (19 mg/kg) and lead (400 mg/kg) are both less than their respective NJDEP RDCSRS.

- If the XRF analysis finds arsenic or lead at concentrations greater than the RDCSRS in the sample from the 1.5' – 2.0' interval, the boring will be extended an additional foot, and a sample will be collected from the 2.5' – 3.0' interval for XRF analysis. The field screening will continue at 1-foot intervals (3.5' – 4.0', 4.5' – 5.0', etc.) until the XRF analysis finds neither arsenic (19 mg/kg RDCSRS) nor lead (400 mg/kg RDCSRS) at levels greater than their respective RDCSRS.

- When the XRF screening indicates that both arsenic and lead are less than the RDCSRS, then a sample will be collected from that 1-foot interval and submitted to the laboratory for TAL Metals plus cyanide analysis. A sample will also be collected from the 1-foot interval immediately above the bottom interval and submitted for the same TAL metals plus cyanide analysis. A Soil Sampling Protocol (Figure 2) is provided for reference.

- There will be no interval spacing greater than 4 feet between samples. If this is the case, then an intermediate sample will be collected for laboratory analysis for TAL metals plus cyanide.

- Borings will extend to a maximum depth of 8 feet below ground surface (bgs); however all borings will terminate at the water table, should it be encountered at a depth shallower than 8 feet bgs. No samples will be collected below the water table.

- If, based on PID readings and field observations (odor, evidence of staining), the field team concludes there is a potential for volatile organic compounds to be present, the sample will also be submitted to the laboratory and analyzed for Target Compound List (TCL) VOCs.

- If the XRF analysis finds arsenic or lead at a concentration greater than the RDCSRS in a boring located along the northern perimeter of the 23A W. Clementon Road property, the southern perimeter of the 43 W. Clementon Road property, or the eastern perimeter of any property, a step-out boring will be installed ten feet beyond the applicable property line (or the off-property sampling locations east of 29 W. Clementon Road). The boring will be installed to the same depth as the boring in which the constituent was found at a concentration greater than the RDCSRS. Sample collection and screening from the step-out borings will be conducted in the same manner as the residential property borings.

In backyards and areas that are accessible, a compact Geoprobe unit (Model 540 MT) designed for limited access areas will be used to advance the soil borings. In backyards that are not accessible to the compact Geoprobe unit, then either hand-driven cores or hand augers will be used to collect soil samples for screening and/or laboratory analysis.

All borings will be observed and logged. If evidence of fill placement, such as brick fragments, cinders, ash, or other similar observations are noted by the field team, the boring will be extended to a depth where native soil is encountered.

Upon completion of each soil boring, the soil will be placed back into the boring. If additional soil is needed to fill the boring, then commercial top soil will be used.

Following completion of the soil sampling program, Sherwin-Williams will prepare a report summarizing the results and submit this report to EPA. The report will contain recommendations for further investigation or remedial action, as appropriate.

Discussion

As you know, Sherwin-Williams performed a detailed evaluation of each property, considering the property size and sampling constraints, and proposed a range of grid sampling sizes based on this evaluation. While the total number of sampling locations proposed by Sherwin-Williams as a result of its analysis (123) is similar to that specified by the EPA with the use of the 20' x 20' sampling grid, modified with the removal and

relocation of sampling locations (144), Sherwin-Williams disagrees with the concept that a uniform grid pattern should be applied to all of the properties.

The basis for Sherwin-Williams' sampling proposal was clearly and directly presented in the April 29, 2010 submittal, and discussed how the individual property sizes and characteristics were used to develop the proposed grid spacing. We maintain our position that to utilize one sampling frequency for all properties is not appropriate (e.g., 43 W. Clementon Road is nearly four times as large as several of the other properties such as 23A, 23B and 25 W. Clementon Road).

Based on the locations eliminated by EPA from the 20' x 20' grid on the larger properties, it can be concluded that the EPA has also considered property size and characteristics in its recommended sampling program. However, this consideration may not be initially evident to a reviewer with less familiarity and expertise in evaluating the sampling program. The statement in the comment letter that *"EPA and NJDEP maintain the utilization of a uniform 20' x 20' grid sample spacing per property across all properties"* may create confusion when reviewed by the public. Again, it would be Sherwin-Williams' preference to directly state for the public that a "one size fits all" approach is not suitable, and discuss the factors that were considered in developing the sample collection frequency, rather than beginning with the statement that a uniform approach will be used, and then making significant modifications to that approach.

As stated previously, however, Sherwin-Williams has accepted the EPA comments and will implement the residential sampling program specified by EPA for the eight W. Clementon Road residential properties.

Should you have any other recommendations or if you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,

Mary Lou Capichioni

Mary Lou Capichioni
Director Remediation Services

Attachment
cc: J. Josephson, EPA (New York)
W. Sy, EPA (Edison)
L. Vogel, NJDEP (4 copies)
P. Parvis, HDR
J. Gerulis, Sherwin-Williams (w/o enclosures)
A. Danzig, Sherwin-Williams (w/o enclosures)
S. Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione (w/o enclosures)
H. Martin, ELM
R. Mattuck, Gradient
S. Jones, Weston Solutions
S. Clough, Weston Solutions
A. Fischer, Weston Solutions

Attachment

SHERWIN-WILLIAMS.

WESTON SOLUTIONS

GIBBSBORO
REMEDIAL INVESTIGATION/FEASIBILITY STUDY

PROPERTY OWNER SURVEY QUESTIONNAIRE

PROPERTY OWNER:	**DATE:**
RESIDENCE ADDRESS:	**INTERVIEWER:**

1. How long have you owned or rented the property in question?

2. During the period you have owned your property, have you observed any discolored soils, stressed vegetation or any unusual odors?

3. Has there been any sampling conducted at the property?

4. If so, who conducted the sampling, for what purposes was this conducted and are the sample results available?

5. Has there been any remedial, construction, landscaping, clearing or any other earth disturbing activities conducted at the property?

6. Can you provide the details of any earth disturbing activities described above if any were conducted, and provide any maps, drawings or design plans if available?

SHERWIN-WILLIAMS.

WESTON SOLUTIONS

GIBBSBORO
REMEDIAL INVESTIGATION/FEASIBILITY STUDY

PROPERTY OWNER SURVEY QUESTIONNAIRE

PROPERTY OWNER: **DATE:**

RESIDENCE ADDRESS: **INTERVIEWER:**

7. If any earth moving activities were conducted at the property, was anything unusual discovered such as empty containers, discolored soils, or foul odors?

8. Has any additional soil/fill been introduced to the property or any low-lying area filled?

9. Have any structures been established on the property (i.e. new deck or shed) or any extension added to the home?

10. Are there any plans to conduct any landscaping, tree removal, extensions, and/or other construction activities in the near or distant future at the property?

11. Other notes/comments:

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN 17 2010

Ms. Mary Lou Capichioni
Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: Addendum to the May 2009 Supplemental RI Work Plan
Sherwin-Williams/Hilliard's Creek Site – Former Manufacturing Plant,
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035
Incorporation of West Clementon Road Residential Properties, dated April 29, 2010

Dear Ms. Capichioni:

The United States Environmental Protection Agency (EPA) and New Jersey Department of Environmental Protection (NJDEP) have reviewed the following document: "Incorporation of West Clementon Road Residential Properties", submitted by the Sherwin-Williams Company on April 29, 2010 and have the following comments.

General Comment

EPA and NJDEP maintain the utilization of a uniform 20' x 20' grid sample spacing per property across all residential properties, however, as will be presented later there will be instances when samples can be eliminated (rationale is provided later, on a property-by-property basis). EPA recognizes that both EPA data and data collected by the Sherwin-Williams Company will be used for future considerations. EPA is also recommending that an updated residential access form be sent which explains that additional sampling may be necessary and that the access form may cover any (future) event(s).

Specific Comments

1. Discussion (The size of the sampling grid), page 3
    - EPA approves the sampling grid presented in Figure 1 (20 x 20) and will use this figure as the basis of specific comments/exceptions. EPA and NJDEP agree with the 20 x 20 foot grid as proposed for 23A, 23B and 25 W. Clementon Road.

- Use a 20 x 20 ft. grid for 29 W. Clementon Road. Remove samples: 29-SB13 and SB-14B, however, place a sample approximately 10 ft. diagonally off the southwest corner of the house (approximately in the middle between fence and sidewalk); remove sample 29-SB18 and shift 29-SB17 to the approximate middle of flower bed, and include a sample 20 ft. immediately west of EPA sample "29-ss-10".

- Utilize a 20 x 20 ft grid at 31 West Clementon Road, but do not collect samples: 31-SB7 (because have clean EPA sample – 31-ss-6) and 31-SB10 (because have a clean EPA sample 31-ss-5).

- Utilize a 20 x 20 foot grid, but rather than collecting sample 33-SB3 at proposed location (because of the fact that there is a "clean" EPA sample 33-ss-9), relocate the sample to the front of the house and situate it 10 ft. off fence-line and the approximate middle between house and fence), additionally, can eliminate sample 33-SB14, because it appears to be much closer than 20 ft. from sample 33-SB13.

- Utilize a 20 x 20 ft. grid for 35 West Clementon Road for samples 35-SB1 – 35-SB23; however, please eliminate sample 35-SB17 (because have clean EPA sample at 35-ss-3. In addition, remove samples 35-SB20 – 35-SB22; finally shift samples 35-SB24 and 35-SB25 10 ft. off fence-line. Samples SB-26 and SB-27 are appropriate as proposed.

- Utilize a 20 x 20 ft. grid for 43 West Clementon Road; however, the following samples from the proposed spacing should be retained: SB1, SB3 – SB6, SB-8, SB 10, SB-12, SB-13, SB-15, SB-17, SB-19 – SB22, SB-24, SB-25, SB-27, SB-29, SB-32, SB-34, SB-36, SB-38, SB-40, SB-42, SB-43, SB-46, SB-47, SB-49, and SB-51.

2. Discussion (Re-sampling of previous locations at which EPA found arsenic and/or lead at a concentration greater than the RDCSRS), page 3 – EPA concurs with Sherwin-Williams' proposal to return to the EPA sample locations where one or more constituents were found at a level greater than the RDCSRS, but when the grid boring location and the former EPA location are in close proximity to each other (within 5 feet), it is proposed that the EPA boring location be used in place of the grid location.

3. Discussion (Horizontal Delineation), page 4 – Additional Step-Out Borings for Horizontal Delineation, Page 7 - Horizontal Delineation, page 7 SW proposes off-property sampling to the north of 23A and South of 43 and east of all properties if necessary. However, EPA requests that at 29 West Clementon Road two samples be placed 10 ft. from the back of the fence parallel to samples 29-SB1 and 29-SB2. At 31 West Clementon Road, the area in back of the resident's fence be sampled now, based on the resident's statement that he moved dirt to the other side of the fence during landscaping activities on his property. Finally, EPA is also requesting that two samples be placed at 35 West Clementon Road (based on EPA data), and that two samples be collected 10 ft. from samples 35-SB3 and 35-SB4.

4. Discussion (Additional Step-Out Boring for Horizontal Delineation), page 7 – The first sentence of the last paragraph cites that a "removal action" may be designed; please revise this sentence to the language which is used on Page 9, that cites "...recommendations for further investigation or remedial action, ..".
5. Scope of Work (Bullet 1), page 9 – EPA concurs with approach.

6. Scope of Work (Bullet 2), page 9 – EPA is requesting that any step-out past a residential property line not be 15 ft., but 10 ft.

7. Scope of Work (Bullet 3), page 9 - SW is proposing the use of a PID to screen soils and has set a "limit" reading of 100 ppm as an action level. Previously when EPA had requested the use of an "action limit" for the PID, the response was that it should be left to the judgment of the field technician. Should keep it consistent, not sure why an arbitrary number was selected.

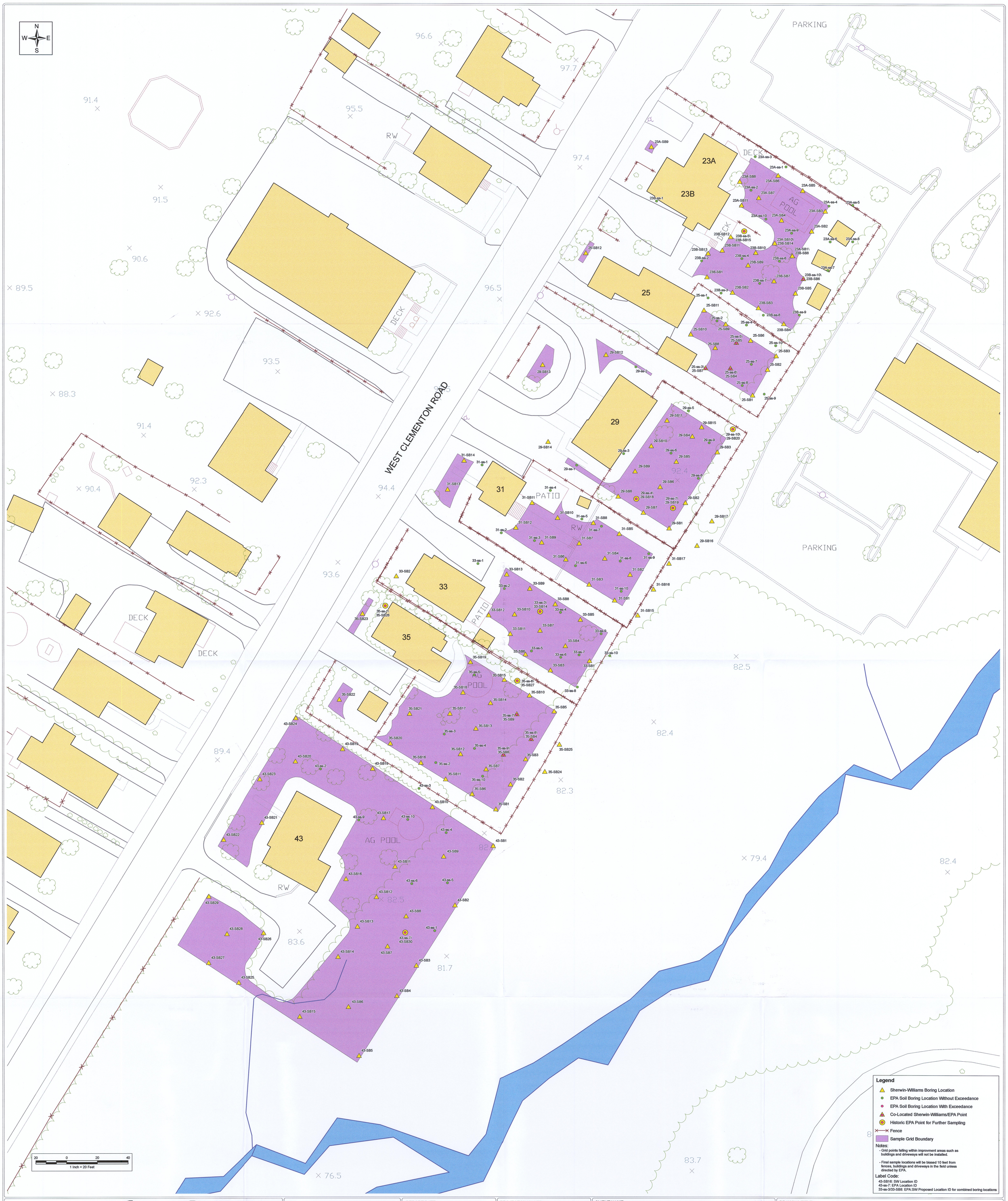
Please provide a revised Addendum within 30 days of receipt of this comment letter. If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

cc: John Doyon, NJDEP

Figures



Legend

- Sherwin-Williams Boring Location
- EPA Soil Boring Location Without Exceedance
- EPA Soil Boring Location With Exceedance
- Co-Located Sherwin-Williams/EPA Point
- Historic EPA Point for Further Sampling
- Fence
- Sample Grid Boundary

Notes:
- Grid points falling within improvment areas such as buildings and driveways will not be installed.
- Final sample locations will be biased 10 feet from fences, buildings and driveways in the field unless directed by EPA.

Label Code:
43-SB16: SW Location ID
43-ss-7: EPA Location ID
33-ss-3/33-SB8: EPA:SW Proposed Location ID for combined boring locations

WESTON SOLUTIONS

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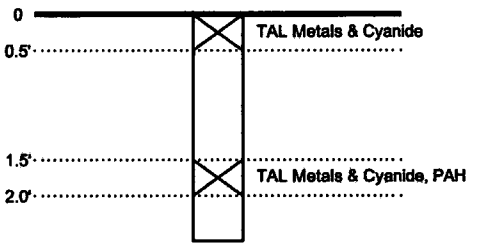
COVER THE EARTH
SHERWIN WILLIAMS

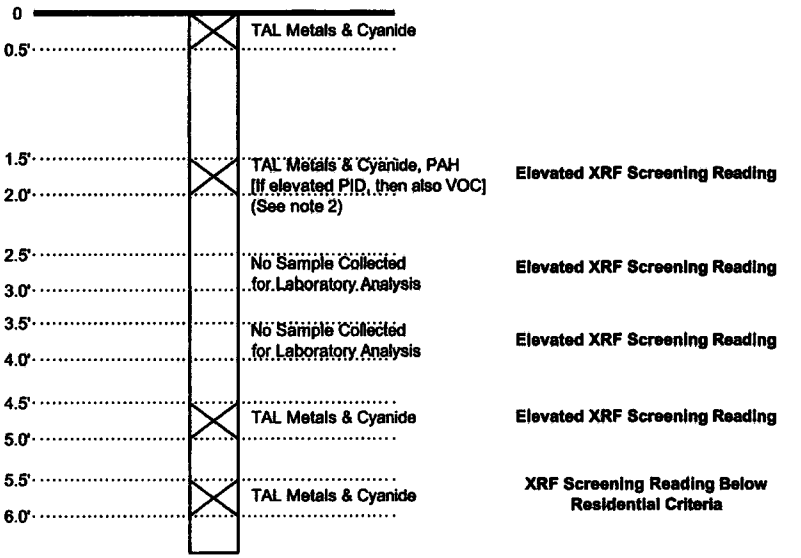
REPORT DATE: October 2010	PROJECT MANAGER: S. Jones	CLIENT NAME: The Sherwin-Williams Company	DRAWING TITLE: Proposed Grid Sampling Scheme West Clementon Road Residential Soil Sampling Program Modified 20-Foot Grid
DRAWING: 08423_Clementon_Concep_Grid.mxd PATH: L:\SHERWIN\GIS\MXD\1010_W_Clem_Grids\	CHECKED BY: G. Caprario		
REVISION No. 1	CONTRACT No. DELIVERY ORDER NO.	PROJECT NAME: Sherwin-Williams Remedial Investigation	
WORK ORDER No. 20076.022.079.0005	DRAWN/MODIFIED BY: S. Poultney DATE CREATED: 11-3-09		FIGURE: 1 / SCALE: 1" = 20' / DATE: 10-15-2010

Soil Sampling Protocol

Typical Sampling Interval
Based on No Remarkable Observations
No XRF or PID Exceedances



Typical Sampling Interval
Based on Elevated Field Screening
Results and Observations



Notes:

1. All samples submitted to laboratory will be analyzed for TAL Metals plus Cyanide.
2. Any intervals exhibiting PID readings above background will also be submitted for VOC analysis.
3. The sample immediately above the bottom interval at which field screening and observations indicate no contamination will be submitted for TAL Metals plus Cyanide.
4. The sample from the bottom interval at which field screening and observations indicate no contamination will be submitted for TAL Metals plus Cyanide.
5. If there is greater than a 4-foot interval between the 1.5-2.0 foot sample interval and the sample interval immediately above the bottom interval, then an intermediate sample will be selected for laboratory analysis based upon either the highest XRF or PID reading and/or visual observations.

LEGEND:
- Sample collected and submitted for laboratory analysis

PROJECT:
West Clementon Road Residential Properties

CLIENT NAME:
The Sherwin-Williams Company

TITLE:
Soil Sampling Protocol
West Clementon Road Residential Properties

DATE:
Oct. 15, 2010

FIGURE #:
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